The Twin City FM Club (TCFMC) is a 501C3 organization chartered in the state of Minnesota. An organization formed by a group of Radio Amateurs to better promote and utilize amateur radio in general and amateur repeaters in particular for the common good of the community and radio amateurs. Membership currently numbers about 125 Amateur Radio Operators who are located mostly in the Twin Cities of Minneapolis and St. Paul, MN

The TCFMC opposes RM-11715. We agree with and support the detailed scientific comments provided by The Northern Lights Radio Society (Posted 4/7/2014, 7521097011.txt), by the ARRL and many other RF Scientists that have commented on RM-11715. Rather than rehash the Technical specifics so well document in the 200+ comments, we will address a more business and layman?s approach.

Radio Amateurs as a group are highly trained and intimately understand the Radio Arts and RF energy beyond that of most current technical users. The design, engineering, and understanding in this spectrum is very scientific and esoteric in nature and not to be decided on a business concept or presumed fabricated need to create a new business. The power levels in discussion should only be dealt with by a technician or scientist with a proper understanding of its consequences. Radio amateurs who are often scientists and top level engineers are the experts in this area. These power levels are not something that should just handed to the general public. The general public has little understanding or education in the use and protection from RF exposure at the suggested RF levels in every aspect of the project from the user to the distribution grid.

It does not appear that Mimosa has done their due diligence.

1. Just by the nature of their document, they do not yet appear to have a proper RF scientist on staff to properly advise their proposal. There are various areas in their document that present this proposal as a complete entrepreneurial business plan instead of a scientific undertaking.

2. Their proposed RF levels seem completely inconsistent with even the current FCC RF exposure standards.

3. Their misunderstanding of absorption at 10-10.5 is surprising as Amateur radio, the Military, and Telco have extensive documentation concerning this aspect. Most recently the NLRS members in high standing have done and documented extensive experiments regarding rain scatter, snow scatter, and thunderhead reflection showing the reflective matter of 10-10.5.

4. Their assumption that the band is underutilized shows a complete lack of research in current modes of use, operation, and location specifics by radio amateurs. They simply have not listened to the band with the proper equipment during contests and daily use and which is documented in the ARRL band plan.

5. Their assumption that this would resolve coast to coast or additional rural penetration use is completely false. If there was a need and cost effective process to accomplish this, the current cellular industry would have already addressed and installed such capacity. There is a reason why there are significant wholes in the cellular industries penetration maps. It is just not cost effective. If there is a future need they will address it.

5. Their opinion that the overall cost to the consumer would be lower is again completely false. Every one in business knows that the more product you produce the lower the cost. They are starting from ground zero. The cellular industry is all ready mature and all cell phone and device manufactures are producing or buying the cheapest components already. In addition the cellular industry is consisently redeveloping themselves, speeds, and cost effective devices.

6. Their claim that they can create greater speeds is highly unlikely in the near term. The Cellular industry is consistently redeveloping themselves and have increased both capacity and speeds to meet the needs of the current smart phone and

tablet industry. There no reason to expect that the Cellular industry will halt or slow this process.

In short Mimosa appears to be trying find a solution to a problem that does not exist and gain access to spectrum that is better served by the Cellular industry within their current spectrum.

Again The TCFMC opposes RM-11715